## IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

CHELSEY GOSSE, et al.,	)	Case No. 3:20-cv-01446-RDM
Plaintiff,	)	Hon. Robert D. Mariani
V.	)	Hon. Robert B. Warram
TRANSWORLD SYSTEMS, INC., et al.,	)	Electronically Filed
Defendants	)	

## PORTNOY SCHNECK, L.L.C.'s MOTION TO DISMISS PLAINTIFFS' FIRST AMENDED COMPLAINT

NOW COMES Portnoy Schneck, L.L.C. ("Portnoy"), through undersigned counsel and pursuant to Fed. R. Civ. P. 12(b)(6) moves to dismiss the First Amended Complaint, for the reasons set forth in a supporting memorandum of law to be filed in accordance with Local Rule 7.5.

WHEREFORE, Portnoy respectfully requests the Court enter an Order dismissing all claims and causes of action asserted against it the First Amended Complaint.

## Local Rule 7.1 Certification

The undersigned certifies that opposing counsel's concurrence in the requested relief was sought, but counsel has not concurred.

Date: February 16, 2021 Respectfully submitted,

/s/ Aaron R. Easley

Aaron R. Easley, Esq. (#73683) SESSIONS, ISRAEL & SHARTLE, L.L.C. 3 Cross Creek Drive

Flemington, NJ 08822 Telephone: (908) 237-1660

Facsimile: (908) 237-1663

Email: aeasley@sessions.legal

Justin H. Homes, Esq. (PHV) SESSIONS, ISRAEL & SHARTLE, L.L.C. Lakeway II 3850 N. Causeway Blvd., Ste. 200 Metairie, LA 70002-7227 Telephone: (504) 828-3700

Facsimile: (504) 828-3737 Email: jhomes@sessions.legal

Counsel for Portnoy Schneck, L.L.C..

## **CERTIFICATE OF SERVICE**

I certify that on February 16, 2021, a copy of the foregoing was filed electronically in the ECF system. Notice of this filing will be sent to the parties of record by operation of the Court's electronic filing system, including plaintiff's counsel as described below:

Robert P. Cocco Robert P. Cocco, P. C. 1500 Walnut Street, Suite 900 Philadelphia, PA 19102 Scott C. Borison 1900 S. Norfolk St. Suite 350 San Mateo, CA 94403

Christina L. Henry Henry & DeGraaff, PS 787 Maynard Ave S Seattle, WA 98104

/s/ Aaron R. Easley
Attorney